

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 20017, 20025, 20026, 25076, 25105,
25107, 29595, 29891 & 29892

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the FTX Recovery Trust,² hereby certify as follows to the best of my knowledge, information and belief:

1. On June 26, 2023, North Field Technology Ltd. (“North Field,” and together with the FTX Recovery Trust, the “Parties”) filed Claims 3310, 3321, 3328, and 3357 against Alameda Research LLC, FTX Trading Ltd., Maclaurin Investments Ltd., and West Realm Shires Services Inc. (“WRSS”), respectively. On June 26, 2023, North Field also filed Claims 3285, 3496, and 3800 against Debtors West Realm Shires Financial Services Inc., FTX Trading Ltd., and WRSS, respectively.

2. On July 10, 2024, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Debtors’ Objection to Proofs of Claim Filed by North Field Technology Ltd.* [D.I. 20017] (the “Claims Objection”), the *Declaration of Steven P. Coverick in*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

Support of Debtors' Objection to Proof of Claim Filed by North Field Technology Ltd. [D.I. 20025], and the *Declaration of Bruno Requiao Da Cunha in Support of Debtors' Objection to Proof of Claim Filed by North Field Technology Ltd.* [D.I. 20026].

3. On September 18, 2024, North Field filed the *Response of North Field Technology Ltd. to Debtors' Objection to Proofs of Claim Filed by North Field Technology, Ltd.* [D.I. 25076] and the *Declaration of Roman Bieda* in support thereof [D.I. 25105], along with the *Motion of North Field Technology Ltd. for Entry of an Order (I) Granting Relief from the Automatic Stay; (II) Waiving Bankruptcy Rule 4001; and (III) Granting Related Relief* [D.I. 25107] (the "Stay Relief Motion") and, together with the Claims Objection, the "Contested Matters").

4. On February 18, 2025, the Court entered the *Initial Scheduling Order* [D.I. 29595] (the "Initial Scheduling Order"), establishing a schedule to govern the Contested Matters.

5. On March 10, 2025, the FTX Recovery Trust filed the *Response of FTX Recovery Trust to Motion to Lift Stay of North Field Technology Ltd.* [D.I. 29891] and the *Declaration of Kumanan Ramanathan* in support thereof [D.I. 29892].

6. The Parties have conferred and agreed to a proposed amended schedule (the "Amended Scheduling Order"), a copy of which is attached hereto as **Exhibit A**.

7. The Parties have no objection to the entry of the Amended Scheduling Order. In accordance with the Court's electronic order processing procedures, a copy of the Amended Scheduling Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Amended Scheduling Order at its earliest convenience.

Dated: March 12, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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